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COLE SCHOTZ P.C.

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*Efficiency Counsel to the Official Committee of
Unsecured Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (SHL)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**THIRTY-SEVENTH MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM MARCH 1, 2023 THROUGH MARCH 31, 2023**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Applicant	Cole Schotz P.C.
Name of Client	Official Committee of Unsecured Creditors
Petition Date	September 15, 2019
Date of Order Approving Employment	April 22, 2020 (<i>nunc pro tunc</i> to February 24, 2020)
Time Period Covered	March 1, 2023 – March 31, 2023
Total Fees Incurred	\$51,995.00
Voluntary Fee Reduction (10%)²	\$5,199.50
Total Fees Requested (Total Fees – Voluntary Fee Reduction)	\$46,795.50
20% Holdback	\$9,359.10
Total Fees Requested Less 20% Holdback	\$37,436.40
Total Expenses Incurred	\$3.00
Total Fees and Expenses Requested	\$46,798.50

Cole Schotz P.C. (“Cole Schotz”), in its capacity as efficiency counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Purdue Pharma, L.P. and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this statement of fees and disbursements (the “Thirty-Seventh Monthly Fee Statement”) covering the period from March 1, 2023 through and including March 31, 2023 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [D.I. 529]. By this Thirty-Seventh Monthly Fee Statement, Cole Schotz requests (a) interim allowance and payment of compensation in the amount of \$46,795.50 for fees on account of reasonable and necessary professional services rendered to the Committee by Cole Schotz and (b) reimbursement of actual and necessary costs and expenses in the amount of \$3.00 incurred by Cole Schotz during the Compensation Period.

² Effective January 1, 2022, Cole Schotz agreed to reduce its monthly fees incurred in this matter by ten-percent (10%).

**FEES FOR SERVICES RENDERED
DURING THE COMPENSATION PERIOD**

1. **Exhibit A** sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates and aggregate hours spent by each Cole Schotz professional and paraprofessional that provided services to the Committee during the Compensation Period. The rates charged by Cole Schotz for services rendered to the Committee are the same rates that Cole Schotz charges generally for professional services rendered to its non-bankruptcy clients.³

2. **Exhibit B** sets forth a task code summary that includes the aggregate hours per task code spent by Cole Schotz professionals and paraprofessionals in rendering services to the Committee during the Compensation Period.

3. **Exhibit C** sets forth a complete itemization of tasks performed by Cole Schotz professionals and paraprofessionals that provided services to the Committee during the Compensation Period.

EXPENSES INCURRED DURING THE COMPENSATION PERIOD

4. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

5. **Exhibit E** sets forth a complete itemization of disbursements incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

³ Cole Schotz increased its rates on September 1, 2022, consistent with its customary practice and as disclosed in Cole Schotz's retention application. See ECF No. 1013. Cole Schotz filed a notice of such rate increase on August 29, 2022. See ECF No. 5043.

NOTICE

6. Notice of this Thirty-Seventh Monthly Fee Statement will be given to (i) Purdue Pharma L.P., 201 Tresser Blvd, Stamford, CT 06901, Attn: Jon Lowne (Jon.Lowne@pharma.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Christopher Robertson (christopher.robertson@davispolk.com) and Dylan Consla (dylan.consla@davispolk.com); (iii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg (Paul.Schwartzberg@usdoj.gov); and (iv) the independent fee examiner appointed in these chapter 11 cases, David M. Klauder, Esq., Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware, 19801 (dklauder@bk-legal.com) (collectively, the “Notice Parties”).

7. Objections to this Thirty-Seventh Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties and undersigned counsel to the Committee so as to be received by no later than June 15, 2023 at 12:00 p.m. (ET) (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue.

8. If no objections to this Thirty-Seventh Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

9. If an objection to this Thirty-Seventh Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Thirty-Seventh Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such

an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: June 1, 2023
New York, New York

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Arik Preis
Ira Dizengoff
Arik Preis
Mitchell Hurley
Sara Brauner
One Bryant Park
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- and -

COLE SCHOTZ P.C.

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*Co-Counsel to the Official Committee of Unsecured
Creditors of Purdue Pharma L.P., et al.*

EXHIBIT A

COMPENSATION BY TIMEKEEPER
MARCH 1, 2023 THROUGH MARCH 31, 2023

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Number of Years in that Position	Hourly Billing Rate¹	Total Billed Hours	Total Compensation
Justin R. Alberto	2008	Member (Bankruptcy) (since 2020)	\$740.00	6.9	\$5,106.00
Anthony De Leo	2013	Member (Bankruptcy) (since 2023)	\$685.00	52.4	\$35,894.00
Conor D. McMullan	2019	Associate (Bankruptcy) (since 2022)	\$375.00	13.20	\$4,950.00
Jack M. Dougherty	2021	Associate (Bankruptcy) (since 2020)	\$400.00	8.9	\$3,560.00
Larry Morton	N/A	Paralegal (Bankruptcy) (since 2020)	\$355.00	7.0	\$2,485.00
TOTAL				88.4	\$51,995.00
Less Voluntary Reduction (10%)					(\$5,199.50)
Total Requested					\$46,795.50

¹ On August 29, 2022 Cole Schotz filed its *Notice of Increase of Hourly Rates of Cole Schotz's Professionals* [ECF No. 5043] which adjusted hourly rates effective September 1, 2022.

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY
MARCH 1, 2023 THROUGH MARCH 31, 2023

Project Category	Total Hours	Total Fees
Case Administration	0.5	\$177.50
Committee Matters and Creditor Meetings	6.1	\$4,086.00
Creditor Inquiries	0.3	\$222.00
Fee Application Matters/Objections	13.4	\$5,717.00
Litigation/Gen. (Except Automatic Stay Relief)	34.8	\$23,861.50
Preparation for and Attendance at Hearings	2.1	\$1,328.50
Prepare for and Conduct Interview and Depositions	31.2	\$16,602.50
TOTAL	88.4	\$51,995.00
Less Voluntary Reduction (10%)		(\$5,199.50)
Total Requested		\$46,795.50

EXHIBIT C

Invoice



PURDUE PHARM, L.P.
N/A - FEE APPLICATION ONLY

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS	Invoice Date:	April 6, 2023
	Invoice Number:	944387
	Matter Number:	60810-0001

FOR PROFESSIONAL SERVICES THROUGH MARCH 31, 2023

CASE ADMINISTRATION	0.50	177.50
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/23	LSM	ARRANGE TELEPHONIC APPEARANCE FOR J. ALBERTO AND A. DE LEO FOR MARCH 21, 2023 HEARING	0.50	177.50

COMMITTEE MATTERS AND CREDITOR MEETINGS	6.10	4,086.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	JRA	EMAILS WITH A. PREIS AND UCC AGENDA RE TOMORROW'S CALL	0.30	222.00
03/01/23	JRA	REVIEW UCC UPDATE MATERIALS IN ADVANCE OF CALL	0.60	444.00
03/02/23	ADL	ATTEND UCC CALL	0.50	342.50
03/02/23	CDM	ATTEND OFFICIAL COMMITTEE OF UNSECURED CREDITORS GROUP CALL.	0.60	225.00
03/02/23	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PREIS, M. ATKINSON AND UCC MEMBERS	0.40	296.00
03/03/23	ADL	REVIEW COMMITTEE UPDATE AND ATTACHMENTS THERETO	0.80	548.00
03/06/23	ADL	REVIEW COMMITTEE UPDATE	0.10	68.50
03/09/23	JRA	EMAIL WITH A. PREIS RE TODAY'S UCC CALL	0.10	74.00
03/15/23	JRA	REVIEW A. PREIS UCC UPDATE EMAIL AND MATERIALS	0.20	148.00
03/16/23	ADL	ATTEND UCC CALL	0.60	411.00
03/21/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.40	274.00
03/23/23	ADL	REVIEW 3-21 HEARING SUMMARY	0.30	205.50
03/23/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.80	548.00
03/23/23	ADL	ATTEND UCC CALL	0.30	205.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/29/23	JRA	REVIEW A. PREIS UCC UPDATE EMAIL	0.10	74.00

CREDITOR INQUIRIES			0.30	222.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	JRA	RESPOND TO OPIOID CREDITOR INQUIRIES RE CASE STATUS	0.20	148.00
03/30/23	JRA	T/C WITH CREDITOR RE CASE STATUS	0.10	74.00

FEE APPLICATION MATTERS/OBJECTIONS			13.40	5,717.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	JRA	EMAIL WITH E. LISOVICZ RE FEE APPS	0.10	74.00
03/02/23	LSM	EMAILS WITH J. DOUGHERTY REGARDING MONTHLY FEE APPLICATION DRAFTS	0.30	106.50
03/06/23	ADL	CALL WITH J. DOUGHERTY RE: JANUARY FEE APPLICATION ISSUES	0.10	68.50
03/07/23	JRA	EMAIL WITH A. DELEO RE FEE APP	0.10	74.00
03/08/23	JMD	DRAFT JANUARY FEE STATEMENT FOR COLE SCHOTZ	1.60	640.00
03/08/23	JMD	EMAIL TO A. DELEO RE: DRAFT JANUARY FEE STATEMENT	0.10	40.00
03/09/23	JMD	EMAIL TO E. LIZOVICZ RE: COLE SCHOTZ JANUARY FEE STATEMENT	0.10	40.00
03/09/23	LSM	UPDATE EXHIBITS TO THIRTY-FIFTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO J. DOUGHERTY	0.50	177.50
03/09/23	JMD	REVIEW L. MORTON DRAFT EXHIBITS TO JANUARY FEE APPLICATION	0.20	80.00
03/09/23	ADL	CALL WITH J. DOUGHERTY RE: JANUARY FEE APPLICATION	0.10	68.50
03/09/23	ADL	REVIEW JANUARY FEE APPLICATION	0.50	342.50
03/09/23	LSM	ADDITIONAL REVISIONS TO EXHIBITS TO THIRTY-FIFTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.50	177.50
03/09/23	JMD	REVISE JANUARY FEE APPLICATION RE: REVISED INVOICE (.5) AND EMAIL TO L. MORTON RE: EXHIBITS (.1)	0.60	240.00
03/10/23	JRA	EMAILS WITH LM RE FEE APPS	0.10	74.00
03/10/23	LSM	COMPILE, REVIEW AND FORWARD LEDES FILE TO CO-COUNSEL REGARDING JANUARY 2023 MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.30	106.50
03/16/23	JMD	REVIEW EMAILS FROM A. DELEO RE: FEBRUARY INVOICE (.2); EMAIL TO L. MORTON RE: DRAFT FEBRUARY FEE APP (.1)	0.30	120.00
03/16/23	JRA	EMAILS WITH A. DELEO RE FEE APPS	0.20	148.00
03/20/23	JMD	REVIEW AND REVISE DRAFT COLE SCHOTZ 36TH MONTHLY FEE APPLICATION (.6); EMAIL TO L. MORTON RE: SAME (.1).	0.70	280.00
03/20/23	LSM	COMPLETE DRAFT OF THIRTY-SIXTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO J. DOUGHERTY	1.90	674.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/23	ADL	REVIEW INTERIM FEE ORDER (.1); EMAIL AKIN RE: SAME (.1)	0.20	137.00
03/21/23	ADL	EMAILS RE: FEBRUARY FEE APPLICATION	0.10	68.50
03/21/23	ADL	EMAIL L. MORTON RE: INTERIM FEE HEARING	0.10	68.50
03/21/23	JMD	EMAILS W/ L. MORTON AND A. DELEO RE: UPDATE FEBRUARY FEE STATEMENT	0.30	120.00
03/21/23	JMD	CALL W/ A. DELEO RE: REVISE FEBRUARY FEE STATEMENT	0.10	40.00
03/21/23	ADL	EMAIL J. DOUGHERTY RE: FEBRUARY FEE APPLICATION	0.10	68.50
03/21/23	LSM	COMPILE, REVIEW AND FORWARD TO J. DOUGHERTY THE LEDES FILE FOR COLE SCHOTZ THIRTY-SIXTH MONTHLY FEE APPLICATION	0.30	106.50
03/21/23	ADL	CALL WITH J. DOUGHERTY RE: FEE APPLICATION ISSUES	0.10	68.50
03/21/23	LSM	COMPILE ALL RELATED MONTHLY FEE APPLICATIONS TO NINTH INTERIM FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO A. DE LEO	0.60	213.00
03/22/23	LSM	REVISE/EDIT EXHIBITS TO THIRTY-SIXTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD TO J. DOUGHERTY	0.60	213.00
03/22/23	JMD	EMAILS W/ ACCOUNTING DEPARTMENT RE: LEDES FILE FOR FEBRUARY FEE APP	0.10	40.00
03/22/23	JMD	CONTINUE TO REVISE FEBRUARY FEE APPLICATION	0.70	280.00
03/22/23	JMD	EMAIL TO A. DELEO RE: REVISIONS TO FEBRUARY FEE APP	0.20	80.00
03/22/23	JMD	EMAIL TO L. MORTON RE: REVISED PDF'S OF EXHIBITS TO FEBRUARY FEE APP	0.10	40.00
03/23/23	LSM	ADDITIONAL EDITS TO EXHIBITS TO COLE SCHOTZ FEBRUARY MONTHLY FEE APPLICATIONS	0.40	142.00
03/24/23	ADL	EMAIL E. LISOCVICZ RE: FEE APPLICATION ISSUES	0.10	68.50
03/24/23	ADL	EMAIL J. ALBERTO RE: FEE APPLICATION ISSUES	0.10	68.50
03/24/23	LSM	REVIEW EXHIBITS TO MONTHLY FEE APPLICATIONS	0.70	248.50
03/30/23	JMD	EMAILS W/ E. LISOVICZ RE: COLE SCHOTZ JANUARY FEE APPLICATION	0.10	40.00
03/30/23	JRA	EMAIL WITH J. DOUGHERTY RE FEE APPS	0.10	74.00

LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF)**34.80 23,861.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/23	JRA	EMAILS WITH A. DELEO RE POTENTIAL ESTATE CLAIM	0.20	148.00
03/02/23	ADL	CALL WITH PLAINTIFFS RE: INSURANCE LITIGATION ISSUES	0.70	479.50
03/03/23	JMD	REVIEW C. MCMULLAN DRAFT SUMMARY RE: DEPOSITION OF P. MORIN ON BEHALF OF ASPEN (.3); EMAIL TO C. MCMULLAN RE: SAME (.1).	0.40	160.00
03/03/23	JRA	EMAIL WITH N. CRAMB RE DISCOVERY LETTER	0.10	74.00
03/06/23	ADL	REVIEW MARKUP OF NAVIGATORS POLICY STIPULATION	0.20	137.00
03/06/23	JRA	EMAILS WITH L. SYZMANSKI AND A. DELEO RE DISCOVERY LETTERS	0.20	148.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/23	ADL	REVIEW PRIVILEGE LOG LETTER	0.20	137.00
03/06/23	ADL	REVIEW LIBERTY MUTUAL RFPs; EMAIL UCC TEAM RE: SAME	0.20	137.00
03/06/23	ADL	REVIEW PREMIUM STIPULATION	0.10	68.50
03/06/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	2.10	1,438.50
03/06/23	ADL	REVIEW INSURANCE CLAIMS RESEARCH	0.30	205.50
03/06/23	JRA	EMAIL WITH A. DELEO RE LIBERTY MUTUAL FIRST SET OF RPD'S (.1); REVIEW SAME (.2)	0.30	222.00
03/08/23	JRA	REVIEW DEPOSITION LETTER FROM P. BREENE AND EMAIL FOLLOW UPS RE SAME	0.30	222.00
03/08/23	ADL	REVIEW XL DISCOVERY LETTER	0.20	137.00
03/08/23	JRA	REVIEW PRIVILEGE LOG LETTER	0.10	74.00
03/08/23	ADL	REVIEW AND COMMENT ON NAVIGATORS DISCOVERY LETTER	0.50	342.50
03/08/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.20	137.00
03/08/23	JRA	REVIEW PREMIUM STIP (.1); EMAILS WITH P. BREENE AND A. CRAWFORD RE SAME (.2)	0.30	222.00
03/09/23	JRA	EMAILS WITH A. DELEO AND M. RUSH RE DISCOVERY	0.20	148.00
03/09/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.60	1,096.00
03/09/23	JRA	REVIEW REVISED PREMIUM STIP REDLINE	0.10	74.00
03/09/23	JRA	EMAILS WITH A. CRAWFORD RE NAVIGATORS LETTERS AND OTHER DISCOVERY MATTERS	0.20	148.00
03/10/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	0.90	616.50
03/13/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.70	1,849.50
03/13/23	ADL	EMAILS RE: POLICY STIPULATIONS	0.10	68.50
03/13/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.10	68.50
03/13/23	ADL	EMAILS RE: INSURANCE MEET AND CONFERS	0.20	137.00
03/13/23	ADL	CONTINUE TO REVIEW DOCUMENTS PRODUCED IN ADVERSARY PROCEEDING	2.30	1,575.50
03/13/23	ADL	EMAIL C. MCMULLAN RE: INSURANCE DEPOSITION SCHEDULE	0.10	68.50
03/14/23	ADL	REVIEW MARK UP OF DRAFT RESPONSE TO NAVIGATORS LETTER RE: PRIVILEGE ISSUES	0.30	205.50
03/14/23	ADL	ATTEND MEET AND CONFER RE: NATIONAL UNION POLICY STIPULATION	0.10	68.50
03/14/23	ADL	EMAILS RE: PRIVILEGE ISSUES	0.10	68.50
03/16/23	ADL	ATTEND MEET AND CONFER RE: GULF POLICY STIPULATION	0.30	205.50
03/17/23	ADL	ATTEND INSURANCE LITIGATION STRATEGY MEETING	0.50	342.50
03/21/23	ADL	REVIEW SWISS RE DISCOVERY LETTER	0.20	137.00
03/21/23	ADL	REVIEW INSURANCE LITIGATION STRATEGY MEMO	0.30	205.50
03/21/23	ADL	REVIEW SWISS RE DISCOVERY LETTER	0.30	205.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/23	ADL	INSURANCE DISCOVERY EMAILS	0.30	205.50
03/22/23	ADL	ATTEND INSURANCE LITIGATION STRATEGY CALL	0.50	342.50
03/23/23	ADL	REVIEW RESPONSE TO LIBERTY MUTUAL 30(B)(6) LETTER	0.60	411.00
03/24/23	ADL	EMAILS RE: INSURANCE LITIGATION STRATEGY	0.20	137.00
03/24/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.60	1,781.00
03/27/23	ADL	REVIEW TIG AMENDED STATEMENT OF CLAIM	1.80	1,233.00
03/27/23	ADL	REVIEW EXHIBITS TO AMENDED STATEMENT OF CLAIM	3.40	2,329.00
03/27/23	JRA	EMAIL WITH A. CRAWFORD AND GILBERT RE AMENDED STATEMENT OF CLAIM	0.10	74.00
03/27/23	ADL	REVIEW CLAIMS REPORT	0.10	68.50
03/27/23	ADL	REVIEW NAVIGATORS SECOND AMENDED ANSWER TO INSURANCE COMPLAINT	0.50	342.50
03/28/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.50	1,027.50
03/28/23	ADL	CONTINUE TO REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	3.10	2,123.50
03/28/23	ADL	EMAILS RE: INSURANCE DISCOVERY ISSUES	0.20	137.00
03/29/23	ADL	REVIEW DRAFT RESPONSE TO LIBERTY MUTUAL DISCOVERY REQUESTS	0.40	274.00
03/29/23	JRA	REVIEW SHOOK LETTER	0.20	148.00
03/29/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.30	890.50
03/30/23	ADL	ATTEND CALL WITH INSURERS RE: INSURANCE LITIGATION ISSUES	0.30	205.50
03/30/23	ADL	REVIEW DRAFT OF LIBERTY MUTUAL DOCUMENT REQUESTS	0.30	205.50
03/31/23	JRA	REVIEW WILLIE DISCOVERY LETTER	0.20	148.00

PREPARATION FOR AND ATTENDANCE AT HEARINGS **2.10** **1,328.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/21/23	JRA	CORRESPOND WITH A. DELEO RE TODAY'S HEARING	0.40	296.00
03/21/23	ADL	CALL WITH J. ALBERTO RE: 3-21 HEARING	0.10	68.50
03/21/23	ADL	REVIEW DOCUMENTS AND PREPARE FOR 3-21 HEARING	0.70	479.50
03/21/23	ADL	ATTEND 3-21 HEARING	0.50	342.50
03/21/23	LSM	ASSIST WITH HEARING PREPARATIONS FOR MARCH 21, 2023 HEARING	0.40	142.00

PREPARE FOR AND CONDUCT INTERVIEW AND DEPOSITIONS **31.20** **16,602.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	ADL	ATTEND DEPOSITION OF ERIN OSBOURNE	3.10	2,123.50
03/01/23	ADL	POST-DEPOSITION MEETINGS	0.60	411.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	ADL	REVIEW OSBOURNE DEPOSITION OUTLINE AND OTHERWISE PREPARE FOR DEPOSITION	2.50	1,712.50
03/01/23	ADL	ATTEND DEPOSITION PREP MEETING	1.60	1,096.00
03/01/23	CDM	ATTEND DEPOSITION OF ERIN OSBORNE FOR NA ELITE.	0.70	262.50
03/01/23	CDM	ATTEND DEPOSITION OF ERIN OSBORNE FOR NA ELITE.	1.20	450.00
03/01/23	CDM	ATTEND DEPOSITION OF ERIN OSBORNE FOR NA ELITE.	0.50	187.50
03/01/23	CDM	DRAFT SUMMARY OF DEPOSITION OF ERIN OSBORNE FOR NA ELITE.	2.80	1,050.00
03/01/23	CDM	REVIEW NOTES RE: DEPOSITION OF ERIN OSBORNE FOR NA ELITE.	0.80	300.00
03/01/23	JRA	CONFER WITH A. DELEO RE UPCOMING DEPS	0.20	148.00
03/01/23	JRA	EMAILS WITH A. DELEO RE DEPS	0.20	148.00
03/02/23	JRA	EMAILS WITH A. DELEO AND D. WINDSCHEFFEL RE DEPOSITION REPORT	0.10	74.00
03/02/23	ADL	REVIEW MORIN DEPOSITION OUTLINE	2.70	1,849.50
03/02/23	JRA	REVIEW OSBORNE DEP REPORT	0.20	148.00
03/02/23	JMD	REVIEW EMAILS FROM A. DELEO RE: ASPEN DEPOSITION AND ATTENDANCE AT SAME	0.10	40.00
03/02/23	JMD	REVIEW NOTES RE: DEPOSITION OF PHYLLIS MORIN AND EMAIL SAME TO C. MCMULLAN	0.30	120.00
03/02/23	JMD	ATTEND DEPOSITION OF PHYLLIS MORIN AND TAKE NOTES RE: SAME	2.90	1,160.00
03/02/23	ADL	CALL WITH C. MCMULLAN RE: INSURANCE DEPOSITIONS	0.40	274.00
03/02/23	ADL	REVISE OSBOURNE DEPOSITION REPORT	1.10	753.50
03/02/23	CDM	REVIEW NOTES FROM DEPOSITION OF PHYLLIS MORIN FOR ASPEN.	0.90	337.50
03/02/23	CDM	CONFER W/ A. DE LEO RE: INSURANCE DEPOSITIONS.	0.40	150.00
03/02/23	CDM	ATTEND DEPOSITION OF PHYLLIS MORIN FOR ASPEN.	3.00	1,125.00
03/03/23	CDM	DRAFT SUMMARY RE: DEPOSITION OF PHYLLIS MORIN	2.30	862.50
03/03/23	ADL	REVIEW AND COMMENT ON MORIN DEPOSITION REPORT	0.60	411.00
03/06/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.10	68.50
03/07/23	JRA	EMAILS WITH GILBERT AND INSURERS RE DEPOSITIONS	0.20	148.00
03/10/23	JRA	REVIEW UPDATE DEPOSITION CHART	0.10	74.00
03/14/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.10	68.50
03/14/23	ADL	REVIEW LIBERTY MUTUAL 30(B)(6) LETTER	0.30	205.50
03/24/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.20	137.00
03/27/23	JRA	EMAIL WITH A. DELEO RE DEPOSITION	0.10	74.00
03/27/23	ADL	REVIEW SUPPLEMENTAL ODARCZENKO DEPOSITION NOTICE; EMAIL PLAINTIFFS TEAMS RE: SAME	0.20	137.00
03/28/23	JRA	EMAILS WITH A. DELEO (.1) AND T/C (.1) WITH A. DELEO RE DEPS	0.20	148.00
03/28/23	ADL	REVIEW STEADFAST 30(B)(6) LETTER	0.40	274.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/29/23	JRA	CORRESPOND WITH A. DELEO RE DEPS	0.10	74.00

TOTAL HOURS 88.40

PROFESSIONAL SERVICES:	\$51,995.00
COURTESY DISCOUNT:	\$(5,199.50)
ADJUSTED PROFESSIONAL SERVICES:	\$46,795.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Anthony De Leo	Member	52.40	685.00	35,894.00
Conor D. McMullan	Associate	13.20	375.00	4,950.00
Jack M. Dougherty	Associate	8.90	400.00	3,560.00
Justin R. Alberto	Member	6.90	740.00	5,106.00
Morton, Larry	Paralegal	7.00	355.00	2,485.00
Total		88.40		\$51,995.00

COST DETAIL

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/22/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/22/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
Total			\$3.00

TOTAL SERVICES AND COSTS: \$ 46,798.50

EXHIBIT D

EXPENSE SUMMARY
MARCH 1, 2023 THROUGH MARCH 31, 2023

Expense Category	Service Provider (if applicable)	Total Expenses
Photocopy/Printing/Scanning		\$3.00
TOTAL		\$3.00

EXHIBIT E
Expense Detail

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/29/23	JRA	CORRESPOND WITH A. DELEO RE DEPS	0.10	74.00

TOTAL HOURS 88.40

PROFESSIONAL SERVICES:	\$51,995.00
COURTESY DISCOUNT:	\$(5,199.50)
ADJUSTED PROFESSIONAL SERVICES:	\$46,795.50

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Morton, Larry	Paralegal	7.00	355.00	2,485.00
Total		88.40		\$51,995.00

COST DETAIL

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/20/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/22/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
03/22/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
Total			\$3.00

TOTAL SERVICES AND COSTS: \$ 46,798.50